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January 14, 2021

Honorable Robert D. Drain  
United States Bankruptcy Judge  
U.S. Bankruptcy Court for the District of New York  
2000 Quarropas Street  
White Plains, NY 10601-4140

Re: The Official Committee of Unsecured Creditors v. McKesson Corp.  
(Adv. Pro. 17-08264);  
The Official Committee of Unsecured Creditors v. Pharmacy Systems, LLC  
(Adv. Pro. 17-08265); and  
The Official Committee of Unsecured Creditors v. McKesson Specialty Care  
Distribution Corp. (Adv. Pro. 17-08266)  
(collectively, the "Adversary Proceedings")

Dear Judge Drain:

The Plaintiff and the McKesson defendants respectfully submit this joint request to extend the discovery cutoff deadline and reschedule the pretrial conferences in each of the Adversary Proceedings. All parties in the Adversary Proceedings request an extension of the discovery cutoff from February 12, 2021 to May 14, 2021, and rescheduling the final pre-trial conference to Tuesday, June 1, 2021, if the Court is available on that date. We have been diligently moving the cases forward but, for the reasons stated below, we believe that additional time will be necessary to complete discovery.

The main reasons why the parties request the extension include: (1) the considerable time that has proved necessary to complete the parties' document production and privilege logs; (2) the technical complications involving document review software, which has significantly complicated document review; and (3) the parties' desire to take live depositions in multiple states in person if possible, which is difficult in light of various pandemic-related restrictions.

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Honorable Robert D. Drain  
January 14, 2021  
Page 2

Based on the foregoing, the parties respectfully request that the enclosed proposed amended scheduling and pre-trial orders be entered by the Court.

Very truly yours,

BUCHALTER  
A Professional Corporation



Jeffrey K. Garfinkle  
Shareholder

cc: Tracy Klestadt, Esq.  
Richard K. Milin, Esq.